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June 5, 2007

Delbert K. Rigsby, Esq.
Federal Election Commission
999 E Street, N.W.
Washington, DC 20463
T: (202) 694-1650
F: (202) 219-3932

Re: MUR 5504
Jayann Brantley

Dear Mr. Rigsby:

On May 21, 2007, we received from the Federal Election Commission ("FEC" or the "Commission") a letter dated May 17, 2007, indicating the FEC has found there is reason to believe our client, Mrs. Jayann Brantley, has violated the Federal Election Campaign Act of 1971 (the "Act"). Pursuant to 2 U.S.C. § 437g(a)(3), and in response to the Factual and Legal Analysis provided by the FEC, we submit the following response for the Commission's consideration.

The Factual and Legal Analysis provided by the FEC on May 17, 2007 states, in part, that the Commission has in its possession information that a different individual employed by Karoly Law Offices in 2003 apparently claimed to have been reimbursed by John Karoly for contributions to the Gephardt Committee. See FEC Factual and Legal Analysis, dated May 17, 2007, p. 2. As a result of this third party individual's claim, the Commission has concluded that all of the affidavits submitted by other employees of the Karoly Law Offices in response to the August 2006 complaint, including the affidavit submitted by Mrs. Jayann Brantley, are wrong. *Id.*

As the Commission is certainly aware, the fact that one employee has claimed he or she was reimbursed for his or her contribution to the Gephardt Committee is not proof that other employees in the Karoly Law Office also were reimbursed for their contributions.

There is no dispute that Jayann Brantley worked for the Karoly Law Offices in 2003 and continues to work there today. As a result of her employment, there were in 2003, and continue to be, numerous financial transactions between John Karoly, the employer, and Mrs. Brantley, the employee. The financial transactions include Mrs. Brantley's regular bi-monthly salary payments, sporadic bonus checks for overtime pay, and irregular

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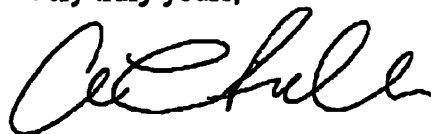
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reimbursement checks for administrative and office-related payments Mrs. Brantley makes at John Karoly's request on behalf of the Karoly Law Offices.

Although Mrs. Brantley received from the Karoly Law Offices salary and bonus checks, as well as reimbursement for offices expenses paid with her own personal funds, the decision to contribute to the Gephardt Campaign in 2003 was her own. We believe the Commission's decision finding there is reason to believe Mrs. Jayann Brantley has violated the Act is premature and unsupported.

If you require any additional information regarding the enclosed statement, please contact me.

Very truly yours,



Amy L. Riella

cc: Jayann Brantley

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